

From: [Moore, Gary](mailto:Moore.Gary)
To: steve@stonemachinerymovers.net
Cc: "[Mickey Edmondson](#)"; [Steven Shurn](#); [Walter, Karen](#); [Brenda Basile](#); [Terry Andrews](#); [Richner, Donald - HHS](#); [Abigail Ryan \(Abigail.Ryan@tceq.texas.gov\)](mailto:Abigail.Ryan@tceq.texas.gov); [Salinas, Amy](#)
Subject: CES: Main Operations Building and Shed
Date: Friday, May 29, 2015 8:07:00 PM

Steve:

It was nice talking to you this afternoon. I wanted to sum up our conversation and give you my thoughts on demo activities and how to proceed.

Based upon our conversation, you indicated that you received that buildings and that you agreed to remove the demolition debris and place it in another parties roll-off boxes for them to dispose. If you have your write-up, I would like to see it. Based upon my review of the buildings in question, these are my thoughts:

- a. **Asbestos Inspection:** According to my EPA Asbestos contact, the building demo(s) would require an asbestos inspection despite the age of the buildings which has no bearing on the requirement for inspection. This is enforced by the Texas Department of State Health Services (Asbestos Program). It will also require 10-day Reno/Demo notification to the Texas Department of State Health Services – Asbestos Program. You should also check with the City of Houston to make sure that you have the permits necessary for demo of the buildings. You should check with TDSHS to see if there is any waiver to this requirement; Who is going to do this?
- b. **Demo Debris -** (1) Two (2) story office/lab (south side of Main Operations Building) area stuffed with debris/trash; (2) Cinderblock wall (Floor to Ceiling) between separate areas of the structure; (3) Interior Insulation on the Roof; (4) Piping connected to the roof; (5) Interior Lighting Units – Potentially mercury containing bulbs with PCB Ballasts. How will these and other items be handled? Items 1-3 should be handled by whoever that someone is that was supposed to be handling the demo debris. Items 4 and 5 should probably be handled by the PRP Group once they are removed from the ceiling by your people.
- c. **Main Operations Building Slab Runoff Control -** Activities to control runoff from the slab and the interior tank areas – quality of water/control of sediment (this needs to be coordinated with the PRP Group);
- d. **Wastewater Treatment Tanks and Piping on the North Area of the Main Operations Building –** It was my understanding that when this was proposed that Stone Machinery would be removing the tanks and piping and placing them on plastic and covering them with plastic. In any event, this needs to be coordinated with the PRP Group.
- e. **Trenches, Sumps, and Secondary Containment structures –** Although these have been cleaned to some degree, there still may be solids that could travel towards the storm drains when rainfall falls on the slab of the building. It may be worse if the piping and tanks are left in place. This needs to be coordinated with the PRP Group.
- f. **Piping/Miscellaneous debris along the West Wall of the Main Operations Building I -** This is piping that was removed from trenches and the wastewater treatment area. This material is currently fine where it is located as long as the building is still standing but when it is taken down this material would have to be placed on plastic and covered with plastic until cleaned, recycled or disposed. This needs to be coordinated with the PRP Group.
- g. **Shed Building –** This building has a floor drain has a floor drain sump and a drum/tote wash area with a sump. EPA cleaned both of these sumps but after the demo these

sumps will collect rainwater that will likely overflow. Although these have been cleaned, they should be checked to make sure that there are not signs or contamination (ie. sheen). Absorbent boom should be place around them and confirmed they will not cause water quality issues. There is also debris that will need to be addressed similar to the Main Operations Building. This should be coordinated with the PRP Group.

I recommend that a **demolition plan** be developed in coordination with the PRP Group, Trustee, and Stone Machinery. It is important to determine who should be responsible for what activities, disposal, and storm water controls and what they should be. The timing of the demo should be agreed by the parties so that adequate controls and responsibility are identified as this should be a coordinated effort.

The EPA only has about 2 – 3 more weeks directly involved at the site before the PRP Group takes over the cleanup actions at the site through the TCEQ Voluntary Cleanup Program. Activities should be coordinated with PRP Group, Trustee, Stone Machinery, to insure that proper environmental controls are in place. It will take a coordinated effort of all parties with interest to achieve the expected results that are expected by the Environmental Agencies (primarily TCEQ, TDSHS, City of Houston) with jurisdiction.

Thanks

Gary Moore

Federal On-Scene Coordinator

U.S. EPA Region 6

214-789-1627 cell

214-665-6609 office

moore.gary@epa.gov